

From: Sorrell, Virginia
Sent: Tuesday, August 07, 2018 05:31 PM
To: Mia, Marcia; Chapman, Apple
Subject: RE: Subpart 0000

I agree with Marcia's thoughts, and I will be interested to hear what Alex says as to compressor station leaks.

Ex. 5 Attorney Client (AC)

Virginia Sorrell
Air Enforcement Division
Office of Civil Enforcement
U.S. Environmental Protection Agency
Phone: 303-312-6669

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From: Mia, Marcia
Sent: Tuesday, August 7, 2018 8:32 AM
To: Chapman, Apple <Chapman.Apple@epa.gov>; Sorrell, Virginia <Sorrell.Virginia@epa.gov>
Subject: RE: Subpart 0000

A couple of points to set his question up in order to answer correctly:

The rule is NSPS 0000a, not NSPS 0000. There are no fugitives monitoring requirements

in 0000.

The current (codified) rule requires quarterly monitoring for fugitives monitoring at compressor stations, except compressor stations in AK. Those can waive a quarter due to temperature (this waiver was effective in March 2018).

Ex. 5 Attorney Client (AC)

Ex. 5 Attorney Client (AC)

Ex. 5 Attorney Client (AC)

Ex. 5 Attorney Client (AC)

Marcia B Mia

Air Branch

Office of Compliance

2227A WJCS

U.S. Environmental Protection Agency

202-564-7042

From: Chapman, Apple

Sent: Monday, August 06, 2018 5:46 PM

To: Mia, Marcia <Mia.Marcia@epa.gov>; Sorrell, Virginia <Sorrell.Virginia@epa.gov>

Subject: Fwd: Subpart 0000

Any thoughts about this question?

Sent from my iPhone

Begin forwarded message:

From: "Traylor, Patrick" <traylor.patrick@epa.gov>

Date: August 6, 2018 at 5:34:59 PM EDT

To: "Chapman, Apple" <Chapman.Apple@epa.gov>

Subject: Subpart 0000

Apple:

An interesting question on the enforceability of a ^{Ex. 5 Attorney Client (AC)} came up to me today.

^{Ex. 5 Attorney Client (AC)} The question is whether we have any special enforcement knowledge that would suggest that a more or less frequent monitoring interval would result in more or less compliance. ^{Ex. 5 Attorney Client (AC)}

Ex. 5 Attorney Client (AC)

Patrick

Patrick Traylor

Deputy Assistant Administrator

Office of Enforcement and Compliance Assurance

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